

REMARKS

Claims 1-9 and 19-28 stand rejected under 35 U.S.C. § 101 as being directed toward non-statutory subject matter. Claims 1-28 stand rejected for obviousness under 35 U.S.C § 103(a) as being unpatentable over Dunn et al., (U.S. Patent No. 7,428,750) (hereafter “Dunn”) in view of Bussler et al., (U.S. Pat. No. 7,072,898) (hereafter “Bussler”). Applicants presently amend the claims and the specification to cure the rejections under 35 U.S.C. § 101. As will be shown below, moreover, neither Dunn nor Bussler, either alone or in combination, teaches or suggests a method, system, or computer program product for cross domain security information conversion as claimed in the present application. Claims 1-28 are therefore patentable and should be allowed. Applicants respectfully request reconsideration of claims 1-28.

Claim Rejections – 35 U.S.C. § 101

Claims 1-9 and claims 10-28 stand rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Claim 1 has been amended to include a computer comprising a computer processor and a computer memory operatively coupled to the computer processor, the computer memory having disposed within it computer program instructions that execute the method and a system entity that comprises automated computing machinery. As such, claim 1 is directed to statutory subject matter and Applicants request that the rejection be withdrawn.

Claim 19 is directed to a computer program product embodied on a recordable computer-readable medium. That is, claim 19 is a Beauregard claim. The Board of Patent Appeals and Interferences in *Ex Parte* Bo Li, Appeal 2008-1213, reversed the rejection of such a computer program product claim under § 101 stating: “It has been the practice for a number of years that a “Beauregard Claim” of this nature be considered statutory at the USPTO as a product claim.” Claim 1 is directed to statutory subject matter and Applicants request that the rejection be withdrawn.

Claim Rejections – 35 U.S.C. § 103

Claims 1-28 again stand rejected under 35 U.S.C. § 103(a) as unpatentable over Dunn in view of Bussler. That is, the present office action maintains the same rejection of claims 1-28 as presented in the Office Action of November 5, 2009. Applicants maintain the traversal of that rejection and also respond the “Response to Arguments Section” of the present Office Action. To establish a prima facie case of obviousness, the proposed combination of Dunn and Bussler must teach or suggest all of Applicants’ claim limitations. MPEP 2142 (citing *In re Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974)). As shown below in more detail, the proposed combination of Dunn and Bussler cannot establish a prima facie case of obviousness because the proposed combination does not teach or suggest each and every element of the claims of the present application. As such, Applicants respectfully traverse each rejection individually.

Claim 1 claims a computer-implemented method for cross domain security information conversion, that includes among other elements, receiving from a system entity, in a security service, security information in a native format of a first security domain, transforming the security information in a canonical format using a predefined mapping from the first security domain to a second security domain; and returning to the system entity the security information in the native format of the second security domain. That is, claim 1 claims security information conversion from security information in the native format of the first second security domain into a native format required by a second domain. The Office Action takes the position that Dunn at various sections of column 19 discloses these aspects of claim 1. Dunn at these cited reference points teaches an identity broker that authenticates a second identity registered by a user if a target service requires the second identity but the user is logged in with a first identity. Dunn at other parts and generally discloses linking identities such that multiple user identities may be managed. Dunn never transforms the format of such identities. In fact, the linked identities of Dunn are in the same format as described at column 9, lines 1-32 and are different identities. That is, Dunn does not disclose transforming anything from a format of a first domain into a format required by a second domain. Even further, Dunn does not

disclose transforming that the same security information transformed into a format required by a second domain from a format of a first domain. Instead, Dunn links different identities in the same format.

The Response to Arguments section of the Office Action states that Applicants previously failed to explain what is meant by the 'same security information.' By using the words same security information in Applicants' arguments, Applicants mean that the security information returned to the system entity in the native format of the second security domain is the equivalent of the security information security information in the native format of the first security domain which was translated to a canonical format, transformed, and translated in the native format of the second security domain. In contrast, Dunn links different identities.

Furthermore, the Response to Arguments section of the Office Action states that Applicants' specification at page 9 suggest that the limitations of claim 1 only require security information native to one security domain to be 'linked' with security information native to a second security domain. Applicants' specification makes no such suggestion. In fact, the word 'linked' does not appear in Applicants' specification. Furthermore, page 9 describes an architecture which includes a security service in the first security domain and a security service in the second security domain. Page 9 describes security service and security information. Page 9 describes that data structures for security information in WS-Federation domains and SAML domains are referred to generally with different terms. The way the word 'token' is used in the specification is also described on page 9. In no way, does page 9 or any other part of the specification suggest that the elements of claim 1 only require security information native to one security domain to be 'linked' with security information native to a second security domain. As such, Dunn does not disclose the limitations for which it is cited.

Bussler does not cure the deficiencies of Dunn. The Response to Arguments section states that Bussler teaches enabling two or more heterogeneous applications to exchange communications with each other. Such broad description of Bussler is insufficient to

teach or suggest the specific limitations of Applicants' claims and cure the deficiencies of Dunn. The instant invention as claimed solves the problem that a data processing entity needs security information formatted in *both* the native formats of two security domains, that is, two different data formats needed by the same data processing entity. The fact that Bussler discloses some form of data format conversion does not teach or suggest transforming formats and then returning the second format to the same entity for use in the second domain as claimed here.

Furthermore, even if Bussler taught something about security, which it does not, there is nothing in Bussler that when combined with Dunn would teach or suggest the elements of claim 1. Note in particular that there is no returning function in Bussler in any way similar to or suggestive of returning to the system entity the security information in the native format of the second security domain as claimed here. On the contrary, the processing disclosed in Bussler takes the transformed data in one direction only, from source-side native phase to source-side application phase, from source-side application phase to common view phase, from common view phase to target-side application phase, and so on. But there is no teaching or suggestion in Bussler of any return from the target side to the source side. The proposed combination of Dunn and Bussler, not teaching or suggesting each and every element of claim 1 cannot be said to teach or suggest all the elements and limitations of the claims of the present application.

Relations Among Claims

Independent claims 10 and 19 recite respectively system and computer program product aspects of the method of claim 1. As explained above in detail, the combination of Dunn and Bussler does not render claim 1 obvious. For the same reasons that the combination of Dunn and Bussler does not render obvious claim 1, the combination of Dunn and Bussler also does not render obvious a system or a computer program product for cross domain security information conversion corresponding to independent claims 10 and 19. Independent claims 10 and 19 are therefore patentable and should be allowed.

Dependent Claims 2-9, 11-18, and 20-28 depend from independent claims 1, 10, and 19. Each dependent claim includes all of the limitations of the independent claim from which it depends. Because the combination of Dunn and Bussler does not render obvious the independent claims, the combination of Dunn and Bussler also does not render obvious the dependent claims of the present application, which are further limitations of the independent claims. As such, claims 2-9, 11-18, and 20-28 are also patentable and should be allowed.

**Further Elements of Dependent Claims
Neither Taught Nor Suggested by Dunn Or Bussler**

Claims 7-10, 16-18, and 26-28 claim mappings expressed in XSL. Neither Dunn nor Bussler even mention XSL. As such, their combination does not teach or suggest mappings using XSL. In addition to the reasons presented above, because neither Dunn nor Bussler teach or suggest mappings expressed in XSL, the rejection of claims 7-10, 16-18, and 26-28 should be withdrawn.

Applicants respectfully request reconsideration of claims 1-28 in light of the amendments and remarks above.

The Commissioner is hereby authorized to charge or credit Deposit Account No. 09-0447 for any fees required or overpaid.

Respectfully submitted,

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By:



H. Artoush Ohanian
Reg. No. 46,022
Biggers & Ohanian, LLP
P.O. Box 1469
Austin, Texas 78767-1469
Tel. (512) 472-9881
Fax (512) 472-9887
ATTORNEY FOR APPLICANTS